

REMARKS

Amendments to the Claims:

The claims have been amended as indicated in the above detailed listing of claims. Specifically:

Claims 1, 11, 15 and 17 have each been amended to include additional elements and/or limitations, which find support at least in figures 1-5 of the drawings;

Claim 18 has been amended to correct a typographical error;
and,

Claim 2 has been canceled because it was made redundant in view of the amendments to claim 1.

No new matter has been added by way of amendments to the claims.

Rejection of Claims Under 35 U.S.C. 102:

Claims 1-3, 5-8 and 11-20 have been rejected under 35 U.S.C. 102(a) as being anticipated by U.S. Patent 6,100,882 to Sharman et al.

As the Applicants have previously noted, the accepted standard for an anticipation rejection provides that "[t]he identical invention must be shown in as complete detail as is contained in the ... claim." (MPEP 2131.) In other words, "[a] claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." (Id.)

In regard to claim 1, that claim has been amended to now include at least the following salient elements and/or limitations:

providing a controller;

receiving into the controller a first signal in voice format from the first individual;

automatically converting the first signal into text format and visually displaying, substantially in real time, the first signal as first portions of text in response to receiving the first signal;

receiving into the controller via a telecommunications network a second signal in voice format from the second individual;

automatically converting the second signal into text format and visually displaying, substantially in real time, the second signal as second portions of text in response to receiving the second signal.

1 The Applicants contend that each and every element as set forth in claim 1 is
2 not found, either expressly or inherently described, in Sharman, as is required for an
3 anticipation rejection.

4 Specifically, the Applicants contend that Sharman does not disclose receiving
5 a first signal and a second signal into a single controller, wherein one of the signals
6 is received via a telecommunications network.

7 Rather, Sharman teaches a method, wherein each participant in a conference
8 has an associated workstation linked together by one or more networks. (Sharman,
9 col. 2, lines 23-26.) The method of Sharman includes steps of receiving local
10 speech input at each workstation; performing speech recognition on the local speech
11 input at the corresponding workstation to generate a local text equivalent; and
12 receiving text equivalents transmitted from each of the workstations associated with
13 the respective participant. (Sharman, col. 2, lines 26-37.)

14 In other words, Sharman discloses a method, wherein each participant has an
15 associated workstation (controller) that converts speech to text only for the
16 respective participant and no other participant. That is, each workstation (controller)
17 converts speech to text for only one associated, local participant.

18 By contrast, in accordance with the method of the Applicants' claim 1, a single
19 controller performs speech to text conversion for a first participant and a second
20 participant, wherein the second participant is linked to the controller via a
21 telecommunications network.

22 The Examiner contends that Sharman, at col. 5, lines 1-31 discloses "wherein
23 the second signal is remotely received from the second individual via a
24 telecommunications network." However, the Applicants point out that Sharman
25 makes clear that the speech to text conversion is performed locally by each
workstation for only the associated, respective participant. That is, although the
audio signals can be transmitted per Sharman from workstation to workstation, this is
for the purpose of distributing audio signals only and not for performing speech to
text conversion. In other words, although Sharman discloses transmitting audio
signals between workstations, nowhere does Sharman disclose receiving into a
single workstation (controller) a first signal and a second signal, and performance of
speech to text conversion on both the first and second signals, wherein the second
signal is received via a telecommunications network.

1 The Applicants contend that claim 1, as amended, is not anticipated by
2 Sharman because Sharman does not disclose the identical invention in as complete
3 detail as is contained in claim 1, as is required for an anticipation rejection. The
4 Applicants therefore respectfully request that the rejection of claim 1 be withdrawn,
and that claim 1 be allowed.

5 In regard to claim 2, that claim has been canceled, and the rejection of that
6 claim is therefore moot.

7 In regard to claims 3 and 5-8, those claims depend from claim 1, and
8 therefore contain all of the elements and/or limitations of claim 1 (as amended). The
9 Applicants contend that claims 3 and 5-8 are therefore not anticipated by Sharman
10 for at least the reasons set forth above with respect to claim 1. Accordingly, the
11 Applicants respectfully request that the rejections of claims 3 and 5-8 be withdrawn
and that claims 3 and 5-8 be allowed.

12 In regard to claim 11, that claim has been amended to now include at least
the following elements and/or limitations:

13 a controller configured to receive a first signal in voice format and also
14 configured to receive via a telecommunications network a second signal in voice
15 format;

16 a visual display device in signal communication with the controller; and,
17 a program comprising a series of computer-executable steps which can be
18 executed by the controller to:

19 automatically convert the first signal directly from voice format into text
20 format in response to receiving the first signal and to automatically convert the
21 second signal from voice format into text format in response to receiving the
22 second signal; and,

23 cause the visual display device to display, in substantially real time, the
24 first signal and the second signal in text format in response to converting the
25 first and second signals into text format.

The Applicants contend that each and every element as set forth in claim 11
is not found, either expressly or inherently described, in Sharman as is required for
an anticipation rejection.

Specifically, the Applicants contend that Sharman does not disclose a single
controller configured to receive a first voice signal and a second voice signal via a

1 telecommunications network, wherein the single controller is further configured to
2 convert the first signal and the second signal into text.

3 Rather, Sharman teaches an apparatus that includes a dedicated workstation
4 (controller) for each participant in a conference, wherein each workstation performs
5 speech to text conversion locally and only for the associated respective participant
6 and for no other participant. (Sharman, col. 2, lines 23-37.)

7 The Applicants contend that claim 11, as amended, is not anticipated by
8 Sharman because Sharman does not disclose the identical invention in as complete
9 detail as is contained in claim 11, as is required for an anticipation rejection. The
10 Applicants therefore respectfully request that the rejection of claim 11 be withdrawn,
11 and that claim 11 be allowed.

12 In regard to claims 12-14, those claims depend from claim 11, and therefore
13 contain all of the elements and/or limitations of claim 11. The Applicants contend
14 that claims 12-14 are therefore not anticipated by Sharman for at least the reasons
15 set forth above with respect to claim 11. Accordingly, the Applicants respectfully
16 request that the rejections of claims 12-14 be withdrawn and that claims 12-14
17 be allowed.

18 In regard to claim 15, that claim has been amended to now include at least
19 the following elements and/or limitations:

20 read a first voice signal received into the controller in voice format;
21 automatically convert the first signal from voice format into text format in
22 response to reading the first signal;
23 read a second signal received via a telecommunications network into the
24 controller in voice format in response to reading the first signal;
25 automatically convert the second signal from voice format into text format.

26 The Applicants contend that each and every element as set forth in claim 15
27 is not found, either expressly or inherently described, in Sharman as is required for
28 an anticipation rejection. That is, Sharman does not disclose a computer-readable
29 storage medium holding computer-executable instructions for use with a controller
30 configured to execute the instructions, wherein the instructions are configured to
31 read first and second signals in voice format and automatically convert the first and
32 second signals from voice format to text format, wherein the first signal is received

1 into the controller, and wherein the second signal is received into the controller via a
2 telecommunications network.

3 Rather, Sharman teaches an apparatus that includes a dedicated workstation
4 (controller) for each participant in a conference, wherein each workstation performs
5 speech to text conversion locally and only for the associated respective participant
and for no other participant. (Sharman, col. 2, lines 23-37.)

6 The Applicants contend that claim 15, as amended, is not anticipated by
7 Sharman because Sharman does not disclose the identical invention in as complete
8 detail as is contained in claim 15, as is required for an anticipation rejection. The
9 Applicants therefore respectfully request that the rejection of claim 15 be withdrawn,
and that claim 15 be allowed.

10 In regard to claim 16, that claim depends from claim 15, and therefore
11 contains all of the elements and/or limitations of claim 15. The Applicants contend
12 that claim 16 is therefore not anticipated by Sharman for at least the reasons set
13 forth above with respect to claim 15. Accordingly, the Applicants respectfully
request that the rejection of claim 16 be withdrawn and that claim 16 be allowed.

14 In regard to claim 17, that claim has been amended to now include at least
15 the following elements and/or limitations:

16 a telecommunications network;

17 at least two telephone devices allowing a support technician to transmit at
18 least one first signal in voice format, and allowing a customer to **transmit at least**
one second signal in voice format via the telecommunications network;

19 a receiver configured to detect the first and second signals;

20 **a controller configured to receive the first and second signals and to**
21 **automatically convert the first and second signals from voice format into text format**
22 **and to generate, in substantially real time, human-readable text substantially**
representative of the first and second signals; and,

23 a visual display device configured to visually display, in substantially real time,
24 the human-readable text to the support technician.

25 The Applicants contend that each and every element as set forth in claim 17
is not found, either expressly or inherently described, in Sharman as is required for
an anticipation rejection. That is, Sharman does not disclose a system comprising a
controller configured to receive a first signal in voice format from a

1 telecommunications device and to receive a second signal in voice format from a
2 telecommunications device via a telecommunications network, and further
3 configured to automatically convert the first and second signals from voice format
4 into text format.

5 Rather, as is described above, Sharman teaches an apparatus that includes a
6 dedicated workstation (controller) for each participant in a conference, wherein each
7 workstation performs speech to text conversion locally and only for the associated
8 respective participant and for no other participant. (Sharman, col. 2, lines 23-37.)

9 The Applicants contend that claim 17 is not anticipated by Sharman because
10 Sharman does not disclose the identical invention in as complete detail as is
11 contained in claim 17, as is required for an anticipation rejection. The Applicants
12 therefore respectfully request that the rejection of claim 17 be withdrawn, and that
13 claim 17 be allowed.

14 In regard to claims 18-20, those claims depend from claim 17, and therefore
15 contain all of the elements and/or limitations of claim 17. The Applicants contend
16 that claims 18-20 are therefore not anticipated by Sharman for at least the reasons
17 set forth above with respect to claim 17. Accordingly, the Applicants respectfully
18 request that the rejections of claims 17-20 be withdrawn and that claims 17-20
19 be allowed.

20 Rejection of Claims Under 35 U.S.C. 103:

21 Claims 9 and 10 have been rejected as being unpatentable over Sharman as
22 applied to claim 1, and further in view of well-known prior art.

23 The Applicants make the following assertions:

- 24 1) Claims 9 and 10 depend from claim 1;
- 25 2) Claim 1 is not anticipated by Sharman for the reasons set forth above;
- 3) Claim 1 has not been rejected under 35 U.S.C. 103;
- 4) "If an independent claim is nonobvious under 35 U.S.C. 103, then any claim
depending therefrom is nonobvious." (MPEP 2143.03.)

Therefore, claims 9 and 10 are nonobvious because claim 1 is nonobvious and
claims 9 and 10 depend from claim 1.

Accordingly, the Applicants respectfully request that the rejections of claims 9
and 10 be withdrawn and that the claims be allowed.

1 Withdrawal of Final Rejections:

2 The Applicants note that further amendment or argument shall be considered
3 by the Examiner, such as when an amendment will place the case in condition for
4 allowance. (MPEP 706.07(f).) In such a situation, amendments may be entered
5 after a final rejection. (MPEP 714.12.) The Applicants believe that the amendments
6 presented herein above will place the case in condition for allowance.

7 Furthermore, the Applicants contend the following:

8 (A) the claims, if amended as proposed, would avoid the prior art and place
9 the case in condition for allowance because none of the prior art disclose
10 all of the elements and/or limitations, as is explained in detail
11 herein above;

12 (B) the claims, if amended as proposed, do not raise the issue of new matter
13 because the amendments are fully supported by the Applicants'
14 specification and/or drawing figures;

15 (C) the claims as amended do not present new issues requiring further
16 consideration or search because the proposed amendments narrow the
17 claims; and,

18 (D) no additional claims have been presented.

19 Therefore, none of the reasons for non-entry of proposed amendments after final
20 rejection, as set forth in MPEP 714.13, are applicable to the amendments as
21 proposed herein above.

22 Accordingly, the Applicants respectfully contend that the final rejections of the
23 claims should be withdrawn, and the proposed amendments should be admitted, and
24 the claims should be allowed.
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by Thomas Oh

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Response to Final Action